

1 Jodie Berger (SBN 124144)  
jberger@wclp.org  
2 Richard Rothschild (SBN 67356)  
rrothschild@wclp.org  
3 Robert Newman (SBN 86534)  
rnewman@wclp.org  
4 Antionette Dozier (SBN 244437)  
adozier@wclp.org

5 **WESTERN CENTER ON LAW & POVERTY**  
3701 Wilshire Blvd., Suite 208  
6 Los Angeles, CA 90010  
7 T: (213) 235-2617  
F: (213) 487-0242

8 Lindsay Nako (SBN 239090)  
lnako@impactfund.org  
9 Lori Rifkin (SBN 244081)  
lrifkin@impactfund.org  
10 Fawn Rajbhandari-Korr (SBN 315888)  
fkorr@impactfund.org  
11 Meredith Dixon (SBN 346864)  
mdixon@impactfund.org

12 **IMPACT FUND**  
2080 Addison St., Suite 5  
13 Berkeley, CA 94704  
T: (510) 845-3473  
14 F: (510) 845-3654

15 *Attorneys for Plaintiffs*

16 **UNITED STATES DISTRICT COURT**  
17 **NORTHERN DISTRICT OF CALIFORNIA**

18  
19 ANIKA OKJE ERDMANN-BROWNING and  
20 JACQUELINE BENITEZ, individually and on  
behalf of all others similarly situated,

21 Plaintiffs,

22 v.

23 THOMAS J. VILSACK, Secretary of the  
United States Department of Agriculture,  
24 in his official capacity; SHALANDA  
YOUNG, Director of the United States  
25 Office of Management and Budget, in her  
official capacity.

26 Defendants.

27 Case No.: 4:23-cv-04678-JST

28 CLASS ACTION

**DECLARATION OF CYNTHIA DE LA  
MORA IN SUPPORT OF PLAINTIFFS'  
MOTION FOR CLASS  
CERTIFICATION**

Hearing date: March 14, 2024  
Time: 2:00 p.m.

Action filed: September 12, 2023

## DECLARATION OF CYNTHIA DE LA MORA

I, Cynthia De La Mora, declare as follows.

1. I have personal knowledge of the facts in this declaration and am competent to testify to them.

2. I am a single parent of five children.

3. I live in North Hollywood, CA.

4. My family's income comes from my earnings from In Home Supportive Services, CalWORKs, and my 12-year-old daughter who gets SSI for a disability.

5. I have not been able to get child support from my children's father.

6. I was getting \$680 in CalFresh until I was recertified in February 2024. Now I'm getting \$535 for the month. I get my benefits on the 5<sup>th</sup> of the month.

7. My work hours had gone up, so when I recertified, both my CalWORKs and CalFresh went down, and my Section 8 rent went up.

8. My very basic expenses take all my income. These include rent, utilities (electricity and gas), food over what CalFresh covers, and internet that I need for my kids to do their homework, phone, laundry and clothing. All my kids are in therapy. My daughter on SSI has to go four times a week. I need to have a car to take them. I am spending \$90 a week on gas, plus \$300 a month for car insurance, and \$700 a month for my car payment. I have two children in diapers. CalWORKs helps a little that, but not enough to pay for all of them. I also have to buy wipes for them, and for my disabled daughter, as she can't use toilet paper and I have to clean her. She has a lot of other personal needs that I need to use the SSI on.

9. When I was getting \$686, the CalFresh would get me through the first two weeks, and then I had to pay cash. With the \$535 I get now, it only lasts a week and a half. I now have to go from food pantry to food pantry to try to get enough at the end of the month. But that comes at a cost – extra gas for the trips and paying someone to watch my little children who can't wait hours in line. It's also really hard on me physically to line up like that, due to my autoimmune disease. Also, they only have fresh food, no non-perishables and I've never been able to get proteins.

10. Both me and my daughter on SSI have special diets that our doctors want us to eat because of my autoimmune disease and my daughter's disability. We both have to eat lots of greens and healthy proteins, and my daughter should not eat fatty foods. I've not been able to get the proteins I need because of the limit of my CalFresh and cash, and the pantries not having any, and my health is suffering.

11. About three times a week, I cut back on my food by skipping meals to make sure my children have a full plate. I'm hungry when this happens. I can't even fill up on water because my doctor recommends that I get distilled water because I'm autoimmune, and I don't want my kids to get that disease either and I don't think the water is safe.

12. When the food is running out, that's all we have. I have to give up on something that I get with cash. With the cost of gas, I have to cut back on the children's therapy, which affects their mental health. I have to skip over the counter medicines like for allergies, the baby wipes, and fever reducers for my son who frequently gets fevers.

13. I know that there are problems with the government not passing a budget, and that it has kept going with temporary funding. If the funding ends and they stop the SNAP program, I won't get my CalFresh. If that happens, I don't know what I would do if the benefits stopped altogether, I don't know what more I could do except keep cutting back. You have to feed your kids, so you have not pay things like rent or other bills. I could go homeless. And I don't know what will happen when it happens to everyone else getting SNAP. The whole state would be crashing – there are so many people who would lose it. Especially with rents so high.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 2/28/2024, 2024, in North Hollywood, Los Angeles County.

DocuSigned by:  
  
A8054EA15C2142E...  
Cynthia De La Mora